

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 12-03-014 (Filed March 22, 2012)
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**DECISION GRANTING COMPENSATION TO THE NATURAL RESOURCES
DEFENSE COUNCIL FOR SUBSTANTIAL CONTRIBUTION
TO DECISION 13-02-015**

Claimant: Natural Resources Defense Council	For contribution to D.13-02-015
Claimed (\$): \$27,121.25	Awarded (\$): \$ 22,656.50 (reduced 16.5%)
Assigned Commissioner: Michel Florio	Assigned ALJ: David M. Gamson

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	D.13-02-015 authorizes long term procurement for resource needs in local capacity areas in Southern California. It authorizes Southern California Edison Company (SCE) to procure between 1400 and 1800 Megawatts (MW) of electrical capacity in the West Los Angeles sub-area of the Los Angeles (LA) basin local reliability area to meet long-term local capacity requirements (LCRs) by 2021. It also authorizes SCE to procure between 215 and 290 MW of the Moorpark subarea of the Big Creek/Ventura local reliability area.
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	April 18, 2012	Verified
2. Other Specified Date for NOI:		
3. Date NOI Filed:	May 18, 2012	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.10-07-007 and A.11-09-016	Verified

6. Date of ALJ ruling:	February 21, 2013	Verified
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A10-07-007 and A.11-09-016	Verified
10. Date of ALJ ruling:	February 21, 2013	Verified
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.13-02-015	Verified
14. Date of Issuance of Final Order or Decision:	February 13, 2013	Verified
15. File date of compensation request:	April 11, 2013	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).

Contribution to D.13-02-015	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<p><i>1. Implementing the State’s Loading Order for preferred resources (A)</i></p> <p>NRDC advocated throughout the proceeding to ensure that any authorization for long term procurement in the local areas comply with the State’s Loading Order, which requires that all cost-effective energy efficiency be procured before any conventional resources. NRDC strongly advocated for compliance with the Loading Order a cornerstone of the proposed authorizations. The Commission agreed, noting its grant of procurement authority must account for energy efficiency first, before procuring non-preferred resources.</p>	<p>D.13-02-015, COL 2: “Consistent with § 454.5(b)(9)(C), which states that utilities must first meet their ‘unmet resource needs through all available energy efficiency and demand reduction resources that are cost-effective, reliable and feasible,’ and the Commission’s Loading Order established in the Energy Action Plan, utility LCR procurement must take into account the availability of preferred resources before procuring non-preferred resources.”</p> <p>D.13-02-015, COL 8: “Adoption of an LCR need range which takes into account the potential differences in the effectiveness of different resources, 100% of uncommitted energy efficiency and uncommitted distributed generation resources, and allows for the potential of</p>	

	<p>demand response resources and energy storage resources which may meet ISO technical criteria for meeting LCR needs, is consistent with the applicable statutory and regulatory requirements for procurement of preferred resources, including the Loading Order.”</p> <p>NRDC, <i>Testimony of Sierra Martinez on Behalf of the Natural Resources Defense Council</i>, p. 2 (June 25, 2012): “ In order to comply with the State’s loading order, a reasonable estimate of energy efficiency must be included before making a determination of local capacity need.”</p> <p>NRDC, <i>Opening Brief of the Natural Resources Defense Council at 14</i> (September 24, 2012): “In order to comply with the State’s loading order, the Commission must include a reasonable estimate of energy efficiency before authorizing any need. . . . The State’s “loading order” established in the EAP II identifies energy efficiency as the state’s top priority resource, and state law codifies this policy and requires that any procurement need must be met first with efficiency.”</p> <p>NRDC, <i>Reply Brief of the Natural Resources Defense Council at 3-4</i> (October 12, 2012): “California law codifies the loading order, which requires that energy efficiency be the top priority resource. This Commission must instruct utilities to procure future energy efficiency first—that is, before procuring any other form of generation.”</p>	Yes, but duplicative of other parties.
<p>2. <i>Whether California ISO’s model results contain a reasonable amount of energy efficiency (B)</i></p> <p>NRDC advocated that ISO’s model results from its 2021 OTC Study omitted substantial amounts of uncommitted energy efficiency that was “reasonably expected to occur.” NRDC advocated that the CPUC should instead adopt ISO’s Sensitivity Analysis, which <i>did</i> include a reasonable amount of energy efficiency. In the final decision, the Commission</p>	<p>D.13-02-015 at 29: “CEJA, NRDC, Sierra Club and WEM all contend that the ISO local capacity methodology should not have excluded significant amounts of uncommitted energy efficiency NRDC claims ‘the amount of efficiency included in the CAISO’s assessment of local capacity needs is unreasonably low because it excludes all savings from future energy</p>	

<p>agreed with this recommendation.</p>	<p>efficiency policies, as well as some that were recently adopted.”</p> <p>D.13-02-015, p.46: “The CEC uncommitted energy efficiency forecast from 2009 included all anticipated energy efficiency programs from 2013-2020, all building code improvements between 2006 and 2020 and all appliance standards improvements between 2005 and 2020. NRDC and CEJA list a number of energy efficiency programs which have already been adopted and are already saving energy, but which were excluded from the ISO forecasts because they were categorized as uncommitted.”</p> <p>D.13-02-015, p.47: “ISO witness Millar agreed that the CEC demand forecast from the 2009 IEPR used by the ISO did not include BBEES or other uncommitted energy efficiency programs. Examples of such programs already adopted or already in place include: California’s 2008 Title 24 Building Code; California’s 2010 Title 20 Lighting Standard; California’s 2010 Television Efficiency Standard; California’s 2012 Title 20 Battery Charge Standard; California’s 2013 Title 24 Building Code; and several Federal standards on appliances such as water heaters and clothes washers.”</p> <p>D.13-02-015, FOF 12: “The four RPS scenarios analyzed by the ISO do not include any uncommitted energy efficiency or uncommitted CHP resources analyzed by the CEC.”</p> <p>NRDC, <i>Opening Brief of the Natural Resources Defense Council</i>, p. 8 (September 24, 2012): “CAISO assumed that the following efficiency policies will provide zero savings, despite the fact that some are already saving energy, and others have already been adopted: California’s 2008 Title 24 Building Code; California’s 2011 Title 20 Lighting Standard; California’s 2011 Television Efficiency Standard; . . . California’s 2013-2014 utility efficiency programs; California’s 2013 Title 20 Battery Charge Standard; California’s 2013 Title 24 Building Code;</p>	<p>Yes, but duplicative.</p>
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	<p>Federal Commercial Refrigerator & Freezer Standard; Federal Electric Water Heaters Standard; Federal Clothes Washers Standard”</p> <p>D.13-02-015, FOF 14: “A significant amount of what is categorized by the CEC as uncommitted energy efficiency is certain to occur because it is based on standards already adopted by the CPUC, the CEC and federal agencies.”</p> <p>NRDC, <i>Testimony Of Sierra Martinez On Behalf Of The Natural Resources Defense Council</i>, p. 2 (June 25, 2012): “The amount of efficiency included in CAISO’s assessment of local capacity need is unreasonably low because it excludes all savings from future energy efficiency policies, as well as some that were recently adopted.” <i>See Id.</i> at 3-5.</p> <p>NRDC, <i>Reply Brief of the Natural Resources Defense Council</i> at. 6 (October 12, 2012): “[T]he amount of uncommitted EE contained in the CAISO Sensitivity Analysis, and which NRDC has proposed in this proceeding, is both reasonable and already lower than what is likely to occur.”</p>	
<p>3. <i>Ensuring that authorization in the LA Basin relies on a reasonable amount of energy efficiency</i></p> <p>NRDC proposed that the CPUC should authorize local capacity resources in the LA Basin based on ISO’s Sensitivity Analysis, as it included the most reasonable amount of energy efficiency, a position with which the Commission agreed.</p>	<p>D.13-02-015, p. 51: “We find that the ISO’s Environmentally Constrained scenario sensitivity analysis includes a reasonable level of uncommitted energy efficiency for the LA basin local area. We will consider this level as part of our authorization of what level of LCR need SCE is authorized to seek.”</p> <p>NRDC, <i>Opening Brief of the Natural Resources Defense Council</i> at 11 (September 24, 2012): “We recommend that the Commission make a determination of need, if any, that relies upon this Sensitivity Analysis as a starting point, since it is the only analysis that includes some amount of uncommitted energy</p>	

	<p>efficiency savings.” <i>See id.</i> at 3.</p> <p>D.13-02-015, FOF 13: “To the extent uncommitted energy efficiency and uncommitted CHP resources ultimately develop, they can be helpful in reducing overall net demand.”</p> <p>D.13-02-015, FOF 15: “In the ISO’s Environmentally Constrained scenario sensitivity analysis, the impacts of uncommitted energy efficiency and uncommitted CHP significantly reduced LCR needs for the LA basin local reliability area compared to other ISO scenarios.”</p> <p>D.13-02-015, FOF 16: “There will be more uncommitted energy efficiency available in the LA basin local reliability area than was included in the ISO Trajectory scenario. The ISO Environmentally Constrained scenario sensitivity analysis includes a reasonable level of uncommitted energy efficiency for the LA basin local reliability area.”</p> <p>D.13-02-015, COL 6: “It is reasonable to assume that 100% of the CEC’s forecast of uncommitted energy efficiency and CHP levels will exist in order to determine minimum and maximum LCR procurement level for the LA basin local area.”</p> <p>NRDC, <i>Testimony Of Sierra Martinez On Behalf Of The Natural Resources Defense Council</i> at. 7-8 (June 25, 2012): “Including an estimate of uncommitted efficiency in calculating SCE’s need for new resources would substantially reduce the local need proposed by CAISO in its testimony.”</p>	Yes
<p>4. <i>Ensuring that authorization in the Big Creek Ventura local area relies on a reasonable amount of energy efficiency (D)</i></p> <p>NRDC proposed that the CPUC should not authorize local capacity resources in the Big Creek/Ventura local area based on ISO’s study results from the 2021 OTC Study, because it did not include a reasonable amount of energy efficiency, a position with which the Commission agreed.</p>	<p>D.13-02-015, FOF 35: “The ISO did not include any values for uncommitted energy efficiency and uncommitted CHP for the Big Creek/Ventura local area.”</p> <p>D.13-02-015, COL 5: “The ISO models overstate the LCR need for the LA basin local area and the Big Creek/Ventura local area.”</p>	Yes

	NRDC, <i>Opening Brief of the Natural Resources Defense Council</i> at.10: “It would be patently unreasonable for this Commission to adopt CAISO’s recommended LCR analyses that exclude uncommitted energy efficiency. Therefore, we strongly urge the Commission to make a procurement decision based on a LCR analysis that, at minimum, includes a reasonable estimate of uncommitted energy efficiency savings, which could be achieved by starting with the Sensitivity Analysis.”	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA)¹ a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: To some extent: Sierra Club California, Center for Energy Efficiency and Renewable Technologies (CEERT), California Environmental Justice Alliance (CEJA), Clean Coalition, and the Vote Solar Initiative.		Verified
d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: NRDC worked with environmental stakeholders throughout the proceeding to avoid redundancy, find common ground and put forth joint compromise positions that resolved issues before reaching the formal Commission process. This was in accordance with general Commission direction for the parties to work together to advocate as effectively and efficiently as possible in the proceeding. NRDC worked cooperatively with other parties to ensure no duplication in our separate comments and NRDC developed unique recommendations for consideration in the proceeding. In particular, we coordinated with DRA and numerous other environmental organizations to discuss our positions in the proceeding, and filed joint comments with the Clean Coalition and Community Environmental Council when possible. NRDC claims zero hours for work coordinating with other parties and only claims for time writing actual comments and reviewing parties’ opening comments. In addition, NRDC’s advocacy was spearheaded by one representative – Sierra Martinez		Verified, but still some duplication

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013), which was approved by the Governor on September 26, 2013.

– eliminating any internal duplication. Minimal hours are claimed for other staff members who supported Mr. Martinez’s work in this proceeding, even though the hours at times were substantive.	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§§ 1801 & 1806):

a. Intervenor’s claim of cost reasonableness:	CPUC Verified
<p>Throughout the proceeding, NRDC advocated for policies to ensure that the local energy needs track of the LTPP proceeding relies on future demand forecasts that include a reasonable amount of energy efficiency. Including energy efficiency assumptions is critical to make a well-informed decision about whether new local resources are needed, and if so, what resources will best meet the Commission’s criteria.</p> <p>NRDC’s participation in these proceedings directly contributed to CPUC decision to rely on uncommitted (not yet funded) energy efficiency in the LTPP local needs assessment. The original direction of the Commission was to omit this efficiency and thus authorize additional conventional power, which would have been more costly and polluting. NRDC provided detailed information about the ability of energy efficiency to reduce expected demand and therefore the need for local resources, which the Commission ultimately adopted and will save customers money and reduce pollution.</p> <p>The contribution of NRDC was substantive and required significant staff hours to ensure productive recommendations. NRDC presented unique recommendations to advance customer and environmental interests, which was distinct from other competing proposals in the proceeding. This ensured a robust record from which the Commission had sufficient information to determine a local needs assessment that included estimated energy efficiency to reduce the amount of conventional power being authorized.</p> <p>NRDC’s contribution to the record and final decision in this proceeding vastly exceeds the cost of NRDC’s participation.</p>	<hr/> <p>Verified</p>
<p>b. Reasonableness of Hours Claimed. <i>NRDC’s Claims are Reasonable and Conservative</i></p> <p>Sierra Martinez led NRDC’s efforts in this proceeding, but worked closely with multiple NRDC staff who consulted regularly on the issues at stake in the proceeding, provided substantive work, technical support, and/or guidance particular to their area of expertise. However, minimal hours claimed are from time spent by staff other than Mr. Martinez..</p> <p>The rates requested by NRDC are purposefully conservative and low on the ranges approved by the Commission, even though the levels of expertise of would justify higher rates. NRDC maintained detailed time records indicating the number of hours that were devoted to proceeding activities. All hours represent</p>	

<p>substantive work related to this proceeding.</p> <p>The amounts claimed are further conservative for the following reasons: (1) No time is claimed for internal coordination, only for substantive policy development; (2) although NRDC spent time developing and coordinating positions with other stakeholders, we claim no hours for this coordination over the entire proceeding; (3) we do not claim time for substantive review by other NRDC staff, even though their expertise was critical to ensuring productive recommendations; (4) we do not claim time for regulatory requirements associated with our advocacy (e.g., time spent writing ex parte notices for the proceeding), and (5) no time was claimed for advocacy blogs to influence the outcome of the Commission's final decision, even though they were used as advocacy similar to comment writing in the formal proceeding.</p> <p>In addition, we do not claim all the time needed to prepare for this claim. D.13-12-015 reached more than 130 pages, all of which Mr. Martinez reviewed to determine which substantial contributions were integrated into the final decision. We also do not claim for ongoing timekeeping or maintenance related to intervenor compensation, even though it is extremely time consuming.</p> <p>The amount requested preparing this claim is also conservative because NRDC is only claiming time spent by Mr. Martinez – who was the main author of the claim – even though others helped compile various sections of the claim. We also use Mr. Martinez's lowest rate (2012) as the basis for the preparation portion of this claim (as identified in Comment 2 below).</p> <p>In sum, NRDC made numerous and significant contributions on behalf of environmental and customer interests, all of which required extensive research and analysis. We took every effort to coordinate with other stakeholders to reduce duplication and increase the overall efficiency of the proceeding. Since our work was efficient, hours extremely conservative, and billing rates low, NRDC's request for compensation should be granted in full.</p>	Verified
c. Allocation of Hours by Issue: See Attachment 1	Verified

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
S. Martinez	2012	89.7	\$215	Comment 2, Res ALJ 281, D0804010.	\$19,285.00	76.1 ^[A]	\$215.00 ²	\$16,361.50
S. Martinez	2013	12.5	\$285	Comment 2,	\$3,562.50	10 ^[A]	\$230.00 ³	\$2,300.00

² Adopted by Decision (D.) 13-05-032.

³ Application of 5% annual step increase and 2.2% Cost-of-Living Adjustment, Resolution ALJ-281. Mr. Martinez had only completed four years of practice in 2013.

				Res ALJ 281 D0804010.				
D. Wang	2012	4.7	\$185	Comment 3, Res ALJ 281, D0804010.	\$869.50	2.5 ^[A]	\$185.00 ⁴	\$462.50
D. Wang	2013	13.75	\$185	Comment 3, Res ALJ 281, D0804010.	\$2,543.75	13.75 ^[A]	\$195.00 ⁵	\$2612.50
	Subtotal:				\$26,261.25	Subtotal:		\$21,736.50
INTERVENOR COMPENSATION CLAIM PREPARATION**								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
S. Martinez	2013	8	\$107.50 ½ of \$215 (which is 2012 rate)	D.10-09-014; Res ALJ 281 1/2 of normal rate	\$860	8	\$115.00 ⁶	\$920.00
	Subtotal:				\$860	Subtotal:		\$920.00
TOTAL REQUEST \$:					\$27,121.25	TOTAL AWARD \$:		\$22,656.50
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Reasonable claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney	Date Admitted to CA Bar⁷		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation			
Sierra Angel Martinez	December 04, 2008		260510		No			

⁴ Ms. Wang's 2008 rate in D. 10-04-022 was \$165.00. With application of two 5% annual step increases, and a 2.2% Cost-of-Living Adjustment per Resolution ALJ-281, this brings her 2012 rate to \$185.00. Application of the same 2.2% Cost-of-Living Adjustment brings her 2013 rate to \$190.

⁵ Application of 2.2% Cost-of-Living Adjustment, Resolution ALJ-281.

⁶ One half of Martinez' awarded 2013 rate of \$230.00 per hour.

⁷ This information may be obtained at: <http://www.calbar.ca.gov/>.

C. Attachments Documenting Specific Claim and Comments on Part III

Attachment or Comment #	Description/Comment
Attachment 1	Staff time records and allocation of time by issue area
Comment 1	<p>The LTPP proceeding is divided into three tracks. Decision 13-02-015 is the culmination of the work to determine what local resource needs are in California, which is Track 1. While Track 1 has a final decision, the other two tracks continue in the LTPP proceeding. In particular, Track 2, which addresses what system-wide resource needs are in California, is ongoing. In Track 2, D.12-12-010, issued December 20, 2012, determined important assumptions for modeling system-wide needs, however, we will claim hours worked in Track 2 at the close of the proceeding. Here, we claim hours only for issues directly addressed in D.13-02-015 and reserve the right to claim the remaining time in other tracks of the proceeding until those issues are resolved in a subsequent final decision.</p>
Comment 2	<p>Rationale for Sierra Martinez’s rate</p> <p><u>2012 Rationale:</u> Sierra Martinez was previously awarded intervenor compensation at a 2011 hourly rate of \$200 in D.13-02-013 for work done in R.09-11-014. We requested a 2012 rate of \$210 for Mr. Martinez for work done in R.10-05-006. Mr. Martinez was a fourth year attorney in 2012. The requested rate included one step increase of 5%, which is allowable within “any given level of experience” per D.08-04-010 (p.8). We now request an updated 2012 rate of \$215, which includes a 2.2% COLA per Resolution ALJ-281. ($\\$210 \times 1.022 = \\214.62, rounded to \$215) We use this lower rate to claim work done preparing this claim, which occurred in 2013.</p> <p><u>2013 Rationale:</u> Mr. Martinez is now a fifth year attorney. We request at the hourly rate of \$285 for work done in 2013, per Resolution ALJ-281.</p> <p>Mr. Martinez represents NRDC at state and local fora to promote clean energy solutions to climate change. Mr. Martinez is the Legal Director of California Energy Projects at NRDC and holds a J.D. from Stanford Law School and a B.A. from Stanford University.</p>
Comment 3	<p>Rationale for Devra Wang’s rate</p> <p><u>2012 Rationale:</u> Devra Wang was previously awarded intervenor compensation at the hourly rate of \$165 in D.10-04-022 for work in R.06-04-009. In 2011, we requested a one 5% step for her work based on D.08-04-010 (p.8), which states “Step increases: limited to two annual increases of no more than 5% each year within any given level of experience for each individual.” We therefore requested a 2011 rate of \$170 for Ms. Wang. There has yet to be a ruling on Ms. Wang’s 2012 rate, therefore we assume a rate of \$170 for purposes of calculating the 2012 rate. For work done in 2012, we request \$185, which includes the second (and final) 5% increase within any given level of experience as well as a 2.2% COLA increase per Resolution ALJ-281. Calculation: $\\$170 \times 1.05 = 178.50$ (rounded to 180). $\\$180 \times 1.022 = \\183.96 (rounded to \$185)</p> <p><u>2013 Rationale:</u> For work done in 2013 for this proceeding, we request the same rate as in 2012.</p>

	Ms. Wang has over twelve years of experience working on energy and environmental policy. Ms. Wang is the Director of NRDC's California Energy Program and holds a Master's degree in Energy and Resources and a Bachelor's degree in Bioengineering, both from the University of California at Berkeley.
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D. CPUC Disallowances and Adjustments:

#	Reason
A	Reduction in hours of 50% for Issue One and 25% for Issue Two due to duplication of other parties' work. As noted by the decision itself, many other parties pointed out issues with CAISO's methodologies and resource availability assumptions. Additionally, for Issue One, the CPUC would have followed the Loading Order even without intervenor argument. The Commission therefore reduces hours for Issues One and Two by a total of 18.3 hours.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))?	Yes

FINDINGS OF FACT

1. The Natural Resources Defense Council has made a substantial contribution to Decision (D.) 13-02-015.
2. The requested hourly rates for the Natural Resources Defense Council's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$22,656.50.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. The Natural Resources Defense Council is awarded \$22,656.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas and Electric Company, and Southern California Edison Company shall pay the Natural Resources Defense Council their respective shares of the award, based on their California-jurisdictional electric revenues for the 2012 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include interest at the rate earned on prime, three-month, non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 25, 2013, the 75th day after the filing of the Natural Resources Defense Council's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1302015		
Proceeding(s):	R1203014		
Author:	ALJ Gamson		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas and Electric Company, Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier ?	Reason Change/Disallowance
Natural Resources Defense Council	04/11/13	\$27,121.25	\$22,656.50	N/A	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Sierra	Martinez	Attorney	Natural Resources Defense Council	\$215.00	2012	\$215.00
Sierra	Martinez	Attorney	Natural Resources Defense Council	\$285.00	2013	\$230.00
Devra	Wang	Expert	Natural Resources Defense Council	\$185.00	2012	\$185.00
Devra	Wang	Expert	Natural Resources Defense Council	\$185.00	2013	\$195.00

(End of Appendix)